

# EXHIBIT A

SEC v. Honig, et al., No. 18 Civ. 8175 (ER) (S.D.N.Y.)  
Privilege Log of Plaintiff Securities and Exchange Commission  
September 6, 2019

DOCUMENT NUMBER	TYPE OF DOCUMENT	GENERAL SUBJECT MATTER OF DOCUMENT	DATE OF DOCUMENT (INCLUDES "DATE CREATED," "DATE MODIFIED," "DATE SENT," OR "SCANNED")	AUTHOR(S) OF DOCUMENT	ADDRESSEE(S) OF DOCUMENT COPIED ON DOCUMENT	PRIVILEGE/ PROTECTION
1	Drafts	Memorandum to Commissioners recommending authorization of action against John H. Ford, prepared in anticipation of litigation and to assist in rendering legal advice and including discussion of investigative steps, ongoing investigations into other individuals, and Commission policies	9/6/17 - 10/13/17	SEC-ENF: Calamari, Wadhwa, Paley, Brown, Bromberg, Nealon	The Commission, representatives in the Office of the General Counsel, Division of Corporation Finance, Division of Trading and Markets, Office of Compliance Inspections and Examinations, Division of Enforcement's Office of Chief Counsel	WP/AC/DP
2	Memorandum	Memorandum to Commissioners recommending authorization of action against John H. Ford, prepared in anticipation of litigation and including discussion of investigative steps, ongoing investigations into other individuals, and Commission policies	10/13/17	SEC-ENF: Calamari, Wadhwa, Paley, Brown, Bromberg, Nealon	The Commission, representatives in the Office of the General Counsel, Division of Corporation Finance, Division of Trading and Markets, Office of Compliance Inspections and Examinations, Division of Enforcement's Office of Chief Counsel	WP/AC/DP
3	Drafts	Memorandum to Commissioners recommending authorization of action against Barry Honig, Michael Brauser, John Stetson, John R. O'Rourke, III, Phillip Frost, Mark Groussman, Elliot Maza, Esq., CPA, Robert Ladd, Brian Keller, Alpha Capital Anstalt, ATG Capital LLC, GRQ Consultants, Inc., HS Contrarian Investments, LLC, Grander Holdings, Inc., Melechdavid, Inc., OPKO Health, Inc., Frost Gamma Investments Trust, Inc., Southern Biotech, Inc., and/or Stetson Capital Investments Inc., prepared in anticipation of litigation and to assist in rendering legal advice, and including discussion of investigative steps, ongoing investigations into other individuals, and Commission policies	7/18/16-9/4/18	SEC-ENF: Wadhwa, Paley, Chandrasekhar, Brown, Bromberg, Daniels	The Commission, representatives in the Office of the General Counsel, Division of Corporation Finance, Division of Trading and Markets, Office of the Chief Accountant, Office of Compliance Inspections and Examinations, Office of the Whistleblower, Division of Enforcement's Office of Chief Counsel, Division of Enforcement's Office of the Chief Accountant	WP/AC/DP
4	Memorandum	Memorandum to Commissioners recommending authorization of action against Barry Honig, Michael Brauser, John Stetson, John R. O'Rourke, III, Phillip Frost, Mark Groussman, Elliot Maza, Esq., CPA, Robert Ladd, Brian Keller, Alpha Capital Anstalt, ATG Capital LLC, GRQ Consultants, Inc., HS Contrarian Investments, LLC, Grander Holdings, Inc., Melechdavid, Inc., OPKO Health, Inc., Frost Gamma Investments Trust, Inc., Southern Biotech, Inc., and/or Stetson Capital Investments Inc., prepared in anticipation of litigation and including discussion of investigative steps, ongoing investigations into other individuals, and Commission policies	8/23/18	SEC-ENF: Wadhwa, Paley, Chandrasekhar, Brown, Bromberg, Daniels	The Commission, representatives in the Office of the General Counsel, Division of Corporation Finance, Division of Trading and Markets, Office of the Chief Accountant, Office of Compliance Inspections and Examinations, Office of the Whistleblower, Division of Enforcement's Office of Chief Counsel, Division of Enforcement's Office of the Chief Accountant	WP/AC/DP
5	Drafts	Memorandum and associated documents to Commissioners recommending authorization of settlement with Alpha Capital Anstalt, Mark Groussman and Melechdavid, Inc., prepared in anticipation of litigation and to assist in rendering legal advice, and including discussion of investigative steps and Commission policies	1/17/19-1/24/19	SEC-ENF: Wadhwa, Paley, Chandrasekhar, Brown, Bromberg, Daniels	The Commission, representatives in the Office of the General Counsel, Division of Corporation Finance, Division of Trading and Markets, Office of the Chief Accountant, Office of Compliance Inspections and Examinations, Office of the Whistleblower, Division of Enforcement's Office of Chief Counsel	WP/AC/DP
6	Memorandum	Memorandum and associated documents to Commissioners recommending authorization of settlement with Alpha Capital Anstalt, Mark Groussman and Melechdavid, Inc., prepared in anticipation of litigation and including discussion of investigative steps and Commission policies	1/24/19	SEC-ENF: Wadhwa, Paley, Chandrasekhar, Brown, Bromberg, Daniels	The Commission, representatives in the Office of the General Counsel, Division of Corporation Finance, Division of Trading and Markets, Office of the Chief Accountant, Office of Compliance Inspections and Examinations, Office of the Whistleblower, Division of Enforcement's Office of Chief Counsel	WP/AC/DP

SEC v. Honig, et al., No. 18 Civ. 8175 (ER) (S.D.N.Y.)  
Privilege Log of Plaintiff Securities and Exchange Commission  
September 6, 2019

DOCUMENT NUMBER	TYPE OF DOCUMENT	GENERAL SUBJECT MATTER OF DOCUMENT	DATE OF DOCUMENT (INCLUDES "DATE CREATED," "DATE MODIFIED," "DATE SENT," OR "SCANNED")	AUTHOR(S) OF DOCUMENT	ADDRESSEE(S) OF DOCUMENT COPIED ON DOCUMENT	PRIVILEGE/ PROTECTION
7	Drafts	Memorandum to Commissioners recommending authorization of settlement with Phillip Frost, Frost Gamma Investments Trust, OPKO Health, Inc., and Southern Biotech, Inc., prepared in anticipation of litigation and to assist in rendering legal advice, including discussion of investigative steps and Commission policies	11/5/18 - 12/20/18	SEC-ENF: Wadhwa, Paley, Chandrasekhar, Brown, Bromberg, Daniels	The Commission, representatives in the Office of the General Counsel, Division of Corporation Finance, Division of Trading and Markets, Office of the Chief Accountant, Office of Compliance Inspections and Examinations, Office of the Whistleblower, Division of Enforcement's Office of Chief Counsel	WP/AC/DP
8	Memorandum	Memorandum to Commissioners recommending authorization of settlement with Phillip Frost, Frost Gamma Investments Trust, OPKO Health, Inc., and Southern Biotech, Inc., prepared in anticipation of litigation and including discussion of investigative steps and Commission policies	12/20/18	SEC-ENF: Wadhwa, Paley, Chandrasekhar, Brown, Bromberg, Daniels	The Commission, representatives in the Office of the General Counsel, Division of Corporation Finance, Division of Trading and Markets, Office of the Chief Accountant, Office of Compliance Inspections and Examinations, Office of the Whistleblower, Division of Enforcement's Office of Chief Counsel	WP/AC/DP
9	Drafts	Memorandum to Commissioners recommending authorization of settlement with Barry Honig and GRQ Consultants, Inc., prepared in anticipation of litigation and to assist in rendering legal advice, and including discussion of investigative steps and Commission policies	5/9/19-5/30/19	SEC-ENF: Wadhwa, Paley, Chandrasekhar, Brown, Bromberg, Daniels	The Commission, representatives in the Office of the General Counsel, Division of Corporation Finance, Division of Trading and Markets, Office of the Chief Accountant, Office of Compliance Inspections and Examinations, Office of the Whistleblower, Division of Enforcement's Office of Chief Counsel	WP/AC/DP
10	Memorandum	Memorandum to Commissioners recommending authorization of settlement with Barry Honig and GRQ Consultants, Inc., prepared in anticipation of litigation and including discussion of investigative steps and Commission policies	5/30/19	SEC-ENF: Wadhwa, Paley, Chandrasekhar, Brown, Bromberg, Daniels	The Commission, representatives in the Office of the General Counsel, Division of Corporation Finance, Division of Trading and Markets, Office of the Chief Accountant, Office of Compliance Inspections and Examinations, Office of the Whistleblower, Division of Enforcement's Office of Chief Counsel	WP/AC/DP
11	Attorney Notes	Analysis relating to memoranda recommending authorization of actions against defendants and settlements with defendants, prepared in anticipation of litigation and to assist in rendering legal advice, and including discussion of investigative steps, ongoing investigations into other individuals, or Commission policies	Various	SEC-ENF: Paley; Chandrasekhar; Bromberg; Brown; Daniels		WP/AC
12	Emails and attorney notes	Correspondence and notes regarding proposed actions, draft memoranda, and draft offers of settlement and proposed consent orders, prepared in anticipation of litigation and to assist in rendering legal advice, and including discussion of investigative steps, ongoing investigations into other individuals, or Commission policies	Various	SEC-ENF: Wadhwa; Paley; Chandrasekhar; Bromberg; Brown; Daniels	Various	WP/AC
13	Drafts	Memorandum seeking formal order of investigation pursuant to delegated authority, prepared in anticipation of litigation, and to assist in rendering legal advice and reflecting consideration of Commission policies	2/18/15 - 3/27/15	SEC-ENF: Paley; Bromberg	Wadhwa	WP/AC/DP
14	Memorandum	Memorandum seeking formal order of investigation pursuant to delegated authority, prepared in anticipation of litigation, and to assist in rendering legal advice and reflecting consideration of Commission policies	3/27/15	SEC-ENF: Paley; Bromberg	Wadhwa	WP/AC/DP
15	Drafts	Memorandum seeking formal order of investigation pursuant to delegated authority, prepared in anticipation of litigation and to assist in rendering legal advice and reflecting consideration of Commission policies	6/2/16-6/15/16	SEC-ENF: Paley; Bromberg	Wadhwa	WP/AC/DP

SEC v. Honig, et al., No. 18 Civ. 8175 (ER) (S.D.N.Y.)  
Privilege Log of Plaintiff Securities and Exchange Commission  
September 6, 2019

DOCUMENT NUMBER	TYPE OF DOCUMENT	GENERAL SUBJECT MATTER OF DOCUMENT	DATE OF DOCUMENT (INCLUDES "DATE CREATED," "DATE MODIFIED," "DATE SENT," OR "SCANNED")	AUTHOR(S) OF DOCUMENT	ADDRESSEE(S) OF DOCUMENT COPIED ON DOCUMENT	PRIVILEGE/ PROTECTION
16	Memorandum	Memorandum seeking formal order of investigation pursuant to delegated authority, prepared in anticipation of litigation and to assist in rendering legal advice and reflecting consideration of Commission policies	6/15/16	SEC-ENF: Paley; Bromberg	Wadhwa	WP/AC/DP
17	Drafts	Memorandum seeking formal order of investigation pursuant to delegated authority, prepared in anticipation of litigation and to assist in rendering legal advice and reflecting consideration of Commission policies	1/24/18 - 1/26/18	SEC-ENF: Paley; Bromberg	Wadhwa	WP/AC/DP
18	Memorandum	Memorandum seeking formal order of investigation pursuant to delegated authority, prepared in anticipation of litigation and to assist in rendering legal advice and reflecting consideration of Commission policies	1/26/18	SEC-ENF: Paley; Bromberg	Wadhwa	WP/AC/DP
19	Drafts	Formal order of investigation and supplemental formal order of investigation, prepared in anticipation of litigation	Various	SEC-ENF: Bromberg; Daniels		WP
20	Draft	Tolling agreement, prepared in anticipation of litigation	1/29/18	SEC-ENF: Bromberg		WP
21	Drafts	Contact lists of witnesses, counsel and producing parties, prepared in anticipation of litigation	2016-2019	SEC-ENF: Bromberg		WP
22	Reports	Regulatory reports by third parties	Various (2015-2019)	Various		31 U.S.C. § 5318(g)(2); 31 C.F.R. § 1023.320(e)(2)
23	Documents	Materials referencing certain regulatory reports by third parties	Various (2015-2019)	Various		WP/ 31 U.S.C. § 5318(g)(2); 31 C.F.R. § 1023.320(e)(2)
24	Emails and documents	Internal SEC correspondence and draft summaries referencing regulatory reports by third parties, prepared in anticipation of litigation	Various (2015-2019)	Various staff within NYRO, including SEC-ENF attorneys Paley, Chandrasekhar, Brown, Bromberg and Daniels	Various staff within NYRO, including SEC-ENF attorneys Paley, Chandrasekhar, Brown, Bromberg and Daniels	WP; 31 U.S.C. § 5318(g)(2); 31 C.F.R. § 1023.320(e)(2)
25	Spreadsheets	Analysis of trading by defendants and related individuals and entities in various securities, including three issuers referenced in the Complaint, prepared in anticipation of litigation at direction of Enforcement attorneys	Various (2015-2018)	Various staff within NYRO, including staff examiners and accountants, Joseph Darragh; Timothy Nealon; Ricky Tong		WP
26	Spreadsheets	Analysis of proceeds of transactions by defendants and related individuals and entities, prepared in anticipation of litigation at direction of Enforcement attorneys	Various (2016-2018)	Various staff within NYRO, including Darragh; Nealon; Tong		WP
27	Spreadsheet	Phone numbers master key of selected phone numbers prepared in anticipation of litigation at direction of Enforcement attorneys	5/31/17	Nealon		WP
28	Document	Counsel information, prepared in anticipation of litigation	8/2018 - 6/3/19	SEC-ENF: Bromberg; Brown		WP
29	Drafts	Correspondence with various third parties in investigation and litigation re subpoenas, document requests, access grants, formal order requests, declarations, meetings, etc., prepared in anticipation of litigation	Various	SEC-ENF: Wadhwa, Paley, Chandrasekhar, Brown, Bromberg, Daniels	Various	WP

September 6, 2019

DOCUMENT NUMBER	TYPE OF DOCUMENT	GENERAL SUBJECT MATTER OF DOCUMENT	DATE OF DOCUMENT (INCLUDES "DATE CREATED," "DATE MODIFIED," "DATE SENT," OR "SCANNED")	AUTHOR(S) OF DOCUMENT	ADDRESSEE(S) OF DOCUMENT COPIED ON DOCUMENT	PRIVILEGE/ PROTECTION
30	Drafts	Requests for assistance from foreign regulators, prepared in anticipation of litigation	Various (2015-2016)	Staff of SEC-Office of International Affairs ("OIA"), including Marianne Olson; Matthew Greiner	Various foreign regulators	WP
31	Memoranda	OIA Memoranda to SEC-ENF transferring materials provided by foreign authorities prepared in anticipation of litigation .	Various (2015-2016)	SEC-ENF: Bromberg SEC-OIA, including Marianne Olson; Matthew Greiner; Stephen Herm	SEC-ENF: Bromberg	WP; 15 U.S.C. § 78x(f)(2)
32	Letters and emails	Correspondence with Ontario Securities Commission ("OSC") re SEC request for assistance and OSC request for access to SEC files, including request from OSC that SEC exert privilege over the request and any related communications between OSC and SEC, prepared in anticipation of litigation and reflecting investigative steps.	Various dates	SEC-ENF: Bromberg OSC: Field; J. Humphreys; Karen Kiang; Ashok Menen	SEC-ENF: Bromberg OSC: Field; J. Humphreys; Karen Kiang; Ashok Menen	WP/LE/Ci; 15 U.S.C. § 78x(f)(1) and/or (2)
33	Letters and emails	Correspondence with OSC relating to matters referenced in OSC access request, over which OSC requested that SEC exert privilege and prepared in anticipation of litigation and reflecting investigative steps	Various dates in 2015	SEC-OIA: Olson SEC-ENF: Bromberg OSC: Field; J. Humphreys; Karen Kiang; Ashok Menen	SEC-OIA: Olson SEC-ENF: Bromberg OSC: Field; J. Humphreys; Karen Kiang; Ashok Menen	WP/LE/Ci; 15 U.S.C. § 78x(f)(1) and/or (2)
34	Letter	Request for Assistance to OSC relating to matters referenced in OSC access request, over which OSC requested that SEC exert privilege, prepared in anticipation of litigation and reflecting investigative steps	8/7/15	SEC-OIA: Marianne Olson	OSC: Allister Field	WP/LE/Ci; 15 U.S.C. § 78x(f)(1) and/or (2)
35	Letters and emails	Correspondence with Autorité des marchés financiers ("AMF"), prepared in anticipation of litigation and reflecting investigative steps	Various dates in 2015	SEC-OIA: Stephen Herm SEC-ENF: Bromberg AMF: Pablo Klein; Jean-St-Jacques	SEC-OIA: Herm SEC-ENF: Bromberg AMF: Pablo Klein; Jean-St-Jacques	WP/LE/Ci; 15 U.S.C. § 78x(f)(1) and/or (2)
36	Letter	Request for Assistance to AMF, prepared in anticipation of litigation and including discussion of investigative steps and investigations into other individuals	8/20/15	SEC-OIA: Stephen Herm	AMF: Pablo Klein; Jean-St-Jacques	WP/LE/Ci; 15 U.S.C. § 78x(f)(1)
37	Draft	Request for Assistance to British Columbia Securities Commission ("BCSC"), prepared in anticipation of litigation and reflecting investigative steps and investigations into other individuals	9/22/16	SEC-OIA: Olson	BCSC: Douglas Muir	WP
38	Draft	Request for Assistance to Financial Market Authority Liechtenstein ("FMAL"), prepared in anticipation of litigation and reflecting investigative steps	8/20/15	SEC-OIA: Greiner	FMAL: Manager, Case Assessment Enforcement Branch	WP
39	Draft	Request for Assistance to Nova Scotia Securities Commission ("NSSC"), prepared in anticipation of litigation and reflecting investigative steps	8/13/15	SEC-OIA: Olson	NSSC: Manager, Case Assessment Enforcement Branch	WP
40	Drafts	Summaries of proposed action for purpose of press release and litigation releases prepared in anticipation of litigation	8/31/18 - 9/7/18	Various SEC staff from SEC-ENF (NYRO; HO)	Various SEC staff from SEC-ENF (NYRO; HO)	WP
41	Documents	Telephone logs, prepared in anticipation of litigation	9/24/15 - 12/15/16; 6/10/16 - 2/24/17	SEC-ENF: Bromberg		WP

SEC v. Honig, et al., No. 18 Civ. 8175 (ER) (S.D.N.Y.)  
Privilege Log of Plaintiff Securities and Exchange Commission  
September 6, 2019

DOCUMENT NUMBER	TYPE OF DOCUMENT	GENERAL SUBJECT MATTER OF DOCUMENT	DATE OF DOCUMENT (INCLUDES "DATE CREATED," "DATE MODIFIED," "DATE SENT," OR "SCANNED")	AUTHOR(S) OF DOCUMENT	ADDRESSEE(S) OF DOCUMENT COPIED ON DOCUMENT	PRIVILEGE/ PROTECTION
42	Emails and memoranda	Correspondence among staff re: status of investigation; investigative and legal strategy; data and document analysis; and document production, prepared in anticipation of litigation	Various	Various SEC staff from SEC-ENF (NYRO; HO); Office of International Affairs; Office of the Whistleblower; various administrative staff	Various SEC staff from SEC-ENF (NYRO; HO); Office of International Affairs; Office of the Whistleblower; various administrative staff	WP
43	Emails and memoranda	Correspondence among staff related to proposed recommendation of actions against defendants, including correspondence with senior officers in the SEC's Division of Enforcement providing information about the case and seeking approval for various steps in the investigation, prepared in anticipation of litigation and to assist in rendering legal advice and including discussion of Commission policies	Various	Various SEC staff from SEC-ENF (NYRO; HO); representatives in the Office of the General Counsel; SEC-OCIE; Division of Trading and Markets; Division of Corporate Finance; SEC-OIA; SEC-ENF Office of Chief Counsel	Various SEC staff from SEC-ENF (NYRO; HO); representatives in the Office of the General Counsel; SEC-OCIE; Division of Trading and Markets; Division of Corporate Finance; SEC-OIA; SEC-ENF Office of Chief Counsel	WP/AC/DP
44	Emails and Attorney Notes	Correspondence, and notes reflecting correspondence, regarding proposed actions, draft memoranda, and recommended actions, including emails to senior officers in the SEC's Division of Enforcement providing information about the case and seeking approval for various steps in the investigation, prepared in anticipation of litigation and to assist in rendering legal advice and including discussion of Commission policies	Various	SEC-ENF: Paley; Chandrasekhar; Brown; Bromberg; Daniels  Various SEC staff from SEC-ENF (NYRO; HO); representatives in the Office of the General Counsel; SEC-OCIE; Division of Trading and Markets; Division of Corporate Finance; SEC-OIA; SEC-ENF Office of Chief Counsel	SEC-ENF: Wadhwa; Paley; Chandrasekhar; Brown; Bromberg; Daniels  Various officials and staff of the SEC, including: The Commission; representatives in the Office of the General Counsel; SEC-OCIE; Division of Trading and Markets; Division of Corporate Finance; SEC-OIA; SEC-ENF Office of Chief Counsel	WP/AC/DP
45	Emails, notes and memoranda	Internal SEC correspondence re: processing of electronic media, prepared in anticipation of litigation	Various	SEC-ENF: Bromberg; Brown, staff of NYRO Litigation Support Services ("LSS")	SEC-ENF: Bromberg; Brown; LSS	WP
46	Emails	Internal SEC emails between and among SEC attorneys, investigators, accountants, contractors, interns, and other SEC staff concerning matters related to the investigations, including data analysis, document production review and analysis, strategy, legal research and theories, prepared in anticipation of litigation	Various	All SEC staff involved in the investigation, including the following NYRO attorneys: Calamari; Wadhwa; Paley; Chandrasekhar; Brown; Bromberg; Daniels	All SEC staff involved in the investigations, including the following NYRO attorneys: Calamari; Wadhwa; Paley; Chandrasekhar; Brown; Bromberg; Daniels, Darraugh, Tong, Nealon	WP
47	Emails	Emails reflecting attorney/legal or factual research and/or analysis, prepared in anticipation of litigation	Various	Lexis-Nexis and Westlaw accounts of SEC-ENF: Brown and Bromberg	SEC-ENF: Chandrasekhar; Brown; Bromberg	WP
48	Letters and emails	Correspondence with FINRA regarding the defendants and/or related individuals and entities, prepared in anticipation of litigation and reflecting investigative steps	Various	SEC-ENF: Bromberg; Paley  Various FINRA officials	SEC-ENF: Bromberg; Paley  Various FINRA officials	WP/LE/CI/ 15 U.S.C. § 78x(f)(1)

SEC v. Honig, et al., No. 18 Civ. 8175 (ER) (S.D.N.Y.)  
Privilege Log of Plaintiff Securities and Exchange Commission  
September 6, 2019

DOCUMENT NUMBER	TYPE OF DOCUMENT	GENERAL SUBJECT MATTER OF DOCUMENT	DATE OF DOCUMENT (INCLUDES "DATE CREATED," "DATE MODIFIED," "DATE SENT," OR "SCANNED")	AUTHOR(S) OF DOCUMENT	ADDRESSEE(S) OF DOCUMENT COPIED ON DOCUMENT	PRIVILEGE/ PROTECTION
49	Spreadsheets	FINRA analyses of trading relating to the defendants and/or related individuals and entities, prepared in anticipation of litigation and reflecting investigative steps	Various	FINRA: Office of Fraud Detection and Market Intelligence Staff		WP/LE/CI/ 15 U.S.C. § 78x(f)(1)
50	Drafts	Grants of access to SEC files to FBI, prepared in anticipation of litigation	Various	SEC-ENF: Calamari, Bromberg; Paley	Officials at the FBI; Jeff Chisholm	WP
51	Letters and emails	Correspondence from SEC to staff of the U.S. Attorney's Office for the Northern District of California ("USA-NDCA") re providing SEC access to files, prepared in anticipation of litigation and reflecting investigative steps	Various	SEC-ENF: Bromberg; Paley	USA-NDCA: Ben Kingsley	WP/LE/CI/ 15 U.S.C. § 78x(f)(1)
52	Drafts	Grants of access to SEC files to NASDAQ, the Ontario Securities Commission, and the Alabama Securities Commission, prepared in anticipation of litigation	Various	SEC-ENF: Wadhwa; Paley	Various officials at NASDAQ, the Ontario Securities Commission, and the Alabama Securities Commission	WP
53	Letters and emails	Correspondence from SEC to staff of NASDAQ, the Ontario Securities Commission, and Alabama Securities Commission re: access to SEC files, prepared in anticipation of litigation and reflecting investigative steps	Various	SEC-ENF: Bromberg; Paley	Various officials at NASDAQ, the Ontario Securities Commission, and the Alabama Securities Commission	WP/LE/CI/ 15 U.S.C. § 78x(f)(1)
54	Drafts	Access Request Letter, prepared in anticipation of litigation	Various	SEC-ENF: Bromberg	FINRA: Paul Lane	WP
55	Letters and emails	Correspondence from SEC to staff of FINRA re: access to FINRA files, prepared in anticipation of litigation and reflecting investigative steps	Various	SEC-ENF: Bromberg	FINRA: Paul Lane	WP/LE/CI/ 15 U.S.C. § 78x(f)(1)
56	Letters and emails	Correspondence with USA-NDCA and FBI re documents, investigation and litigation, prepared in anticipation of litigation and reflecting investigative steps and investigations into other individuals	Various	SEC-ENF: Bromberg; Paley USA-NDCA: Kingsley FBI: Jeff Chisholm	SEC-ENF: Bromberg; Paley, Brown, Chandrasekhar, Daniels USA-NDCA: Kingsley FBI: Chisholm	WP/LE/CI/ 15 U.S.C. § 78x(f)(1)
57	Documents	Information and analyses compiled by the FBI re: defendants and related individuals and entities, prepared in anticipation of litigation and reflecting investigative steps and investigations into other individuals	Various	FBI: Chisholm	SEC-ENF: Bromberg	WP/LE/CI/ 15 U.S.C. § 78x(f)(1)
58	Drafts	Correspondence to producing parties, witnesses, and counsel, prepared in anticipation of litigation	Various	SEC-ENF: Paley; Chandrasekhar; Brown; Bromberg; Daniels	Various	WP
59	Drafts and Memoranda	Analysis of potential charges against various individuals, prepared in anticipation of litigation	2017-2019	SEC-ENF: Wadhwa; Paley; Chandrasekhar; Brown; Bromberg; Daniels	Various	WP
60	Drafts	Complaint and Amended Complaint in SEC v. Honig et al., prepared in anticipation of litigation	8/18 - 3/19	SEC-ENF: Wadhwa; Paley; Chandrasekhar; Brown; Bromberg; Daniels	SEC-ENF: Wadhwa; Paley; Chandrasekhar; Brown; Bromberg; Daniels	WP
61	Drafts	Consents and final judgments, prepared in anticipation of litigation	Various	SEC-ENF: Brown		WP
62	Emails	SEC staff correspondence re consents and final judgments, prepared in anticipation of litigation	Various	SEC-ENF: Wadhwa; Paley; Chandrasekhar; Brown; Bromberg; Daniels	SEC-ENF: Wadhwa; Paley; Chandrasekhar; Brown; Bromberg; Daniels	WP
63	Draft	Settlement chart, prepared in anticipation of litigation	10/23/18	SEC-ENF: Brown		WP

SEC v. Honig, et al., No. 18 Civ. 8175 (ER) (S.D.N.Y.)  
Privilege Log of Plaintiff Securities and Exchange Commission  
September 6, 2019

DOCUMENT NUMBER	TYPE OF DOCUMENT	GENERAL SUBJECT MATTER OF DOCUMENT	DATE OF DOCUMENT (INCLUDES "DATE CREATED," "DATE MODIFIED," "DATE SENT," OR "SCANNED")	AUTHOR(S) OF DOCUMENT	ADDRESSEE(S) OF DOCUMENT COPIED ON DOCUMENT	PRIVILEGE/ PROTECTION
64	Attorney Notes	Notes of telephone contact with producing parties, counsel, and witnesses; notes of internal SEC meetings, prepared in anticipation of litigation	Various	SEC-ENF: Wachwa; Paley; Chandrasekhar; Brown; Bromberg; Daniels		WP
65	Attorney Notes	Outlines for internal SEC meetings and calls and external meetings and calls with counsel, prepared in anticipation of litigation	Various	SEC-ENF: Paley; Chandrasekhar; Brown; Bromberg; Daniels		WP
66	Drafts	Outlines for witness testimony, interviews and proffer meetings, prepared in anticipation of litigation	Various	SEC-ENF: Paley; Chandrasekhar; Brown; Bromberg; Daniels		WP
67	Attorney Notes	Non-verbatim attorney notes and summaries of investigative interviews and proffer meetings, and non-verbatim notes on proffer notes prepared by FBI, reflecting mental impressions of attorneys and prepared in anticipation of litigation: Maza April 5, 2017 Proffer 302; David Hansen July 5, 2018 Proffer 302; Ladd April 30, 2018 Proffer 302; Maza May 4, 2017 Proffer 302; Ford January 26, 2018 Proffer 302; Ford June 14, 2018 Proffer 302; Ford March 30, 2018 Proffer 302; Jaclin October 4, 2018 Proffer 302; Epstein October 18, 2018 Proffer 302; Epstein December 12, 2018 Proffer 302; David Hansen June 22, 2018 Proffer 302; Zazoff November 1, 2018 Proffer 302; Aaron Wise November 2, 2018 Proffer 302; John Stetson February 14, 2019 Proffer 302; Barry Honig April 23, 2019 Proffer 302; March 2, 2016 Interview of Nian Wu	Various	SEC-ENF: Bromberg; Brown; Daniels; Beskin (NYRO Intern)		WP/LE/CI/ 15 U.S.C. § 78x(f)(1)
68	CaseMap	Computer application containing attorney compilation of relevant facts and legal analysis, prepared in anticipation of litigation	Various	SEC-ENF: Bromberg		WP
69	Attorney Notes	Analysis of materials made available to SEC staff by USA-NDCA and FBI, and prepared in anticipation of litigation	2015-2018	SEC-ENF: Paley; Bromberg; Brown; Daniels		WP
70	Attorney Notes	Compilations and analysis of various legal and factual issues, prepared in anticipation of litigation	Various	SEC-ENF: Paley; Chandrasekhar; Brown; Bromberg; Daniels; SEC interns		WP
71	Memoranda	Various legal analyses prepared in anticipation of litigation	Various	SEC-ENF: Bromberg; Brown; SEC interns		WP
72	Attorney Notes	Documents outlining strategies and timelines for collection and analysis of relevant facts and law, prepared in anticipation of litigation	Various	SEC-ENF: Bromberg; Paley; Brown		WP
73	Reports	Thomson-Reuters CLEAR and FINRA CRD reports on various individuals and entities, selected and collected in anticipation of litigation	Various	SEC-ENF: Bromberg		WP
74	Memoranda	Investigative plans, prepared in anticipation of litigation	2015-2018	SEC-ENF: Bromberg; Paley; Brown		WP
75	Drafts	Document requests, including subpoenas and Section 17(a) requests, prepared in anticipation of litigation	Various	SEC-ENF: Bromberg		WP
76	Drafts	Proffer agreements, prepared in anticipation of litigation	Various	SEC-ENF: Bromberg		WP
77	Spreadsheet	Log of tips, complaints and referrals regarding the defendants and the three entities listed in the Complaint, prepared and compiled in anticipation of litigation at direction of Enforcement attorneys	Various	SEC-ENF paralegals		WP/Conf'l Informant/ 15 U.S.C. § 78u-6(h)(2)



SEC v. Honig, et al., No. 18 Civ. 8175 (ER) (S.D.N.Y.)  
Privilege Log of Plaintiff Securities and Exchange Commission  
September 6, 2019

DOCUMENT NUMBER	TYPE OF DOCUMENT	GENERAL SUBJECT MATTER OF DOCUMENT	DATE OF DOCUMENT (INCLUDES "DATE CREATED," "DATE MODIFIED," "DATE SENT," OR "SCANNED")	AUTHOR(S) OF DOCUMENT	ADDRESSEE(S) OF DOCUMENT COPIED ON DOCUMENT	PRIVILEGE/ PROTECTION
78	Drafts	Testimony subpoenas, prepared in anticipation of litigation	Various	SEC-ENF: Bromberg		WP
79	Memoranda and Documents	Internal SEC analyses and recommendation re: L.H. Financial Services prepared in anticipation of litigation, reflecting consideration of Commission policies, and sent to senior officers in the SEC's Division of Enforcement seeking approval for various steps in the investigation	Various	Various staff of SEC-OCIE	Various staff of SEC-OCIE; SEC-ENF: Calamari; Wadhwa; Paley; Amelia Cottrell (former SEC-ENF Associate Regional Director)	WP
80	Emails	Internal SEC correspondence re: possible securities laws violations prepared in anticipation of litigation and reflecting consideration of Commission policies, including emails to senior officers in the SEC's Division of Enforcement providing information about the case and seeking approval for various steps in the investigation	Various	SEC-ENF: Wadhwa, Paley, Chandrasekhar, Brown, Bromberg, Daniels; Staff of SEC Division of Corporation Finance	SEC-ENF: Wadhwa, Paley, Chandrasekhar, Brown, Bromberg, Daniels; Staff of SEC Division of Corporation Finance	WP
81	Emails and memoranda	Internal SEC correspondence regarding tips, complaints or referrals regarding the defendants and/or related individuals and entities	Various	SEC-ENF: Brown, Bromberg, Daniels SEC-Office of Market Intelligence and Office of the Whistle Blower staff	SEC-ENF: Brown, Bromberg, Daniels; SEC-Office of Market Intelligence and Office of the Whistle Blower staff	WP/ Conf'l Informant/ 15 U.S.C. § 78u-6(h)(2)
82	Emails	SEC staff correspondence with Self-Regulatory Organizations ("SRO"), or any Federal agency concerning MGT, the application or interpretation of various provisions of the federal securities laws, drafts of public statements or presentations by SEC staff and Commissioners; the issuance of guidance or decision not to issue guidance concerning the interpretation of various federal securities laws; and the ownership and/or trading by Robert Ladd in MGT securities.	Various	SEC-Division of Corporation Finance; SEC-Division of Trading and Markets; Various SROs, Various Federal Agencies	SEC-Division of Corporation Finance; SEC-Division of Trading and Markets; Various SROs; Various Federal Agencies	WP/DP/CI/LE/ 15 U.S.C. § 78x(f)(1) and (3)
83	Emails	SEC staff communications regarding the application or interpretation of various provisions of the federal securities laws, SEC staff communications concerning the issuance of guidance, or the decision not to issue guidance concerning the interpretation of various provisions of the federal securities laws; drafts of public statements or presentations by SEC staff and Commissioners; SEC staff communications concerning communications with third-parties in connection with the staff's investigation of this matter; SEC staff communications concerning filings by MGT with the SEC	Various	SEC-ENF: SEC-Division of Corporation Finance; SEC Division of Trading and Markets	SEC-ENF; SEC-Division of Corporation Finance; SEC-Division of Trading and Markets	WP/DP
84	Spreadsheets	Chronologies regarding actions by defendants and related individuals and entities, prepared in anticipation of litigation	2016-2018	SEC-ENF: Bromberg		WP

SEC v. Honig, et al., No. 18 Civ. 8175 (ER) (S.D.N.Y.)  
Privilege Log of Plaintiff Securities and Exchange Commission  
September 6, 2019

DOCUMENT NUMBER	TYPE OF DOCUMENT	GENERAL SUBJECT MATTER OF DOCUMENT	DATE OF DOCUMENT (INCLUDES "DATE CREATED," "DATE MODIFIED," "DATE SENT," OR "SCANNED")	AUTHOR(S) OF DOCUMENT	ADDRESSEE(S) OF DOCUMENT COPIED ON DOCUMENT	PRIVILEGE/ PROTECTION
85	Emails and documents	Documents, internal SEC correspondence, and correspondence with a U.S. Attorney's Office concerning the application or interpretation of Sections 13(d)(1), 13(g)(3), 13(g)(1), and/or 13(g)(3) of the Exchange Act and/or Rules thereunder (17 C.F.R. § 240.13d-1(a) and/or § 240.13d-5) or concerning issuing guidance or concerning the decision not to issue guidance regarding the interpretation of Sections 13(d)(1), 13(d)(3), 13(g)(1), and/or 13(g)(3) of the Exchange Act and/or Rules thereunder (17 C.F.R. § 240.13d-1(a) and/or § 240.13d-5), including those prepared in anticipation of litigation, and discussing ongoing investigations or Commission policies.	Various	Various attorneys of the SEC Division of Corporation Finance -- Office of Mergers and Acquisitions; USAO -- Eastern District of NY	Various attorneys of the SEC Division of Corporation Finance -- Office of Mergers and Acquisitions; USAO -- Eastern District of NY	WP/DP/CI/ 15 U.S.C. § 78x(f)(1)
<b>DOCUMENTS PREVIOUSLY PRODUCED WITH REDACTIONS</b>						
86	Emails and memoranda	Internal SEC correspondence regarding tips, complaints or referrals regarding the defendants and/or related individuals and entities; produced at the Bates numbers listed on the attached list.	Various	SEC-ENF: Various staff of Office of Market Intelligence and Office of the Whistleblower	SEC-ENF: Various staff of Office of Market Intelligence and Office of the Whistleblower	WP/Conf'l Informant/ 15 U.S.C. § 78u-6(h)(2)
87	Documents	Personal identifying information of individuals submitting tips, complaints or referrals to the SEC regarding the defendants or the three entities at issue., produced at the Bates numbers provided on the attached list.	Various	Staff of OMI; staff of OWB		Conf'l Informant/15 U.S.C. § 78u-6(h)(2)
88	Document	Personal identifying information of individual submitting a complaint to FINRA, produced at Bates numbers provided on attached list	3/19/15			Conf'l Informant/LE/CI/ 15 U.S.C. § 78x(f)(1)
89	Documents	FINRA internal correspondence regarding status of FINRA investigation, prepared in anticipation of litigation, produced at Bates numbers provided on attached list.	7/13/15			WP/LE/CI/ 15 U.S.C. § 78x(f)(1)
<b>Key</b>						
	Calamari, Andrew	Former NYRO Regional Director				
	Wadhwa, Sanjay	NYRO Sr. Associate Director				
	Paley, Michael	Microcap Fraud Task Force; NYRO Assistant Regional Director				
	Chandrasekhar, Charu	Retail Strategy Task Force, NYRO Assistant Regional Director				
	Brown, Nancy	Sr. Trial Counsel				
	Bromberg, Kate	Sr. Counsel				
	Daniels, Jon	Counsel				
	WP	Work Product Doctrine				
	AC	Attorney Client Privilege				
	LE	Law Enforcement Privilege				
	DP	Deliberative Process Privilege				
	CI	Common Interest Privilege				
	Conf'l Informant	Confidential Informant Privilege				